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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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November 14, 2001

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By Hand

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Revision of Part 15 of the Commission's Rules Regarding
Ultra-Wideband Transmission Systems
ET Docket No. 98-153
Ex Parte Communication**

Dear Ms. Salas:

I am writing on behalf of the Short Range Automotive Radar Frequency Allocation group ("SARA"), an association of automotive and automobile component manufacturers, to notify you of an *ex parte* meeting with staff from the Office of Engineering and Technology ("OET") that occurred on Tuesday, November 13, 2001, concerning issues related to the above-referenced proceeding. A copy of the handout distributed at the meeting is attached hereto.

The meeting was held to address the use of 24 GHz ultra-wideband ("UWB") radar systems designed to enhance road safety. In the meeting, participants explained the operational parameters of the different radar devices proposed by SARA members. SARA's core proposals for inclusion in the Commission's forthcoming UWB Report and Order are set out on pages 12-14 of the attached presentation. In addition to these proposals, SARA particularly seeks clarification on the issues discussed below.

First, SARA does not believe the Commission intends to preclude from operation multimode 24 GHz radar systems that operate in different modes that comply with different sections of Part 15. In this instance, the 24 GHz automotive radars described in this presentation would qualify under rules promulgated in the Commission's UWB Report & Order, under 47 C.F.R. § 15.245, and/or under 47 C.F.R. § 15.249. In an effort to ensure that there is no misunderstanding on this

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point, we believe it is important for the Commission to clarify in its UWB Report & Order both of the following:

- Clarification 1: A 24 GHz radar device that operates for a pre-set time in one mode and a pre-set time in another mode may be authorized under the separate Part 15 rule parts that apply to the different modes.
- Clarification 2: A 24 GHz radar device that operates for an adaptively variable time in one mode and an adaptively variable time in another mode may be authorized under the separate Part 15 rule parts that apply to the different modes.

Second, SARA does not believe the Commission intends to limit the deployment of carrier-based pulsed UWB systems, but SARA believes clarification is necessary regarding the treatment of residual carrier emissions in light of paragraph 43 of the Commission's Notice of Proposed Rulemaking, ET Docket No. 98-153, FCC 00-163 (rel. May 11, 2000) ("NPRM"). Any of the following options would achieve the requested clarification:

- Option 1: Any 24 GHz waveform that is the sum of wideband and narrowband components is acceptable, regardless of how it is produced, provided that its spectral emission properties can be shown to be equivalent to the sum of multiple spectral emissions, each of which individually complies with 47 C.F.R. § 15.245, 47 C.F.R. § 15.249, or [the UWB emission limits to be established in the UWB Report & Order].
- Option 2: 24 GHz ultra-wideband devices with residual carrier emissions need only comply with the absolute peak limit for the emission over its entire bandwidth, and need not comply with the peak signal strength limit measured over a 50 MHz bandwidth.
- Option 3: Ultra-wideband devices with composite waveforms that include both wideband and narrowband components that fall into the 24.0 – 24.25 GHz band need only comply with the absolute peak limit for the emission over the entire wideband bandwidth, and need not comply with the peak signal strength limit measured over a 50 MHz bandwidth.

The proposal contained in paragraph 58 of the NPRM does not stand as a bar to the clarifications requested above. In paragraph 58, the Commission

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proposed to amend 47 C.F.R. § 15.215(c) to state that "intentional radiators operated under the provisions of 47 C.F.R. §§ 15.217-15.255 or Subpart E of the current regulations must be designed to ensure that the main lobe or necessary bandwidth, whichever is less, is contained within the frequency bands designated in those rule section[s] under which the equipment is operated." The purpose of the proposal was to prevent devices from operating at the higher power levels permitted under certain Part 15 rule sections when operating in UWB mode over a wide bandwidth outside the specific bands identified in Part 15 as suitable for higher powered use. It does not appear that the Commission's proposal was intended to restrict the use of hybrid or multimode devices that comply with discrete Part 15 rule sections (including UWB rule sections) relating to particular modes, or devices that produce composite waveforms that include both wideband and narrowband components.

If the Commission were to grant the proposals delineated in pages 12-14 of the attached presentation and issue the clarifications described above, it would make a significant contribution to improving safety on America's highways. SARA greatly appreciates the willingness of OET staff to meet with SARA to discuss these important issues. Those participating in the meeting at the FCC were Bruce Franca, Acting Chief of OET; Julius Knapp, Deputy Chief of OET; John Reed, Senior Engineer in OET; Josef Schuermann of JSConsulting; Daniel Selke of Mercedes-Benz USA; Tim Frasier and Fred Sejalon of Robert Bosch; Martin Kunert of Siemens VDO Automotive; Nicholas Morenc of Delphi Automotive Systems; Paul Zoratti of Visteon; Jeff Schaefer of M/A-COM; Jeff Krauss, consultant to M/A-COM; and Ari Fitzgerald and David Martin of Hogan & Hartson L.L.P., counsel for SARA.

Respectfully submitted,



Ari Q. Fitzgerald
Counsel for SARA

Enclosure

cc (w/enc.): Mr. Bruce Franca
Mr. Julius Knapp
Mr. John Reed

24 GHz Short Range Radar
FCC OET visit Nov.13th, 2001

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SARA PRESENTATION

24 GHz Short Range Radar for Automotive Applications

before the
Office of Engineering and Technology

November 13, 2001

SARA

24 GHz Short Range Radar
FCC OET visit Nov.13th, 2001

AGENDA

- Introduction A. Fitzgerald Hogan & Hartson 3min
- SARA Group J. Schuermann JSConsulting 2min
- Road Safety, Overview, Goals D. Selke DaimlerChrysler 5min
- Frequency Rationale 24GHz J. Schuermann JSConsulting 5min
- Proposed Rulings A. Fitzgerald Hogan & Hartson 3min
- System Description Pulse F. Sejalon On behalf of Bosch 10min
- Tyco, Valeo
- System Description FHSS M. Kunert Siemens VDO 10min
- System Description BPSK N. Morenc Delphi 10min
- Summary of Proposals J. Schuermann JSConsulting 3min
- Discussion, Conclusion All 15min

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SARA GROUP

- ACRONYM:**

Short Range Automotive Radar Frequency Allocation

- CHARTER:**

- Coordinate Regulatory Requirements for **SARA Members**
- Agree on a Common Set of Spectrum Parameters
- Create Radio Standards to enable Certification
- Perform or contribute to Compatibility Studies
- Worldwide harmonization

- MEMBERS & Liaisons**

- Major Car Manufacturers (*Passenger and Truck*)
- Leading Radio Frequency System, Component Manufacturers
- Organizations such as ACEA, CLEPA, VDA
- (*European & Global Auto and Auto Component Mfrs*)

SARA

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SARA

Active Members

“EAG”

External Affairs Group



Mercedes-Benz



Audi



Fiat

SIEMENS VDO
A u t o m o t i v e

BOSCH DELPHI
Automotive Systems

tyco / Electronics
M/A-COM



Visteon

Automotive Systems

A.D.C.

Automatic Distance Control

Control Systems Control

SARA

Active Members

“EG” -- Expert Group

BOSCH

Automotive Systems

Mercedes-Benz

DELPHI
Automotive Systems

SIEMENS VDO
A u t o m o t i v e

tyco / Electronics

M/A-COM

Automatic Distance Control

Control Systems Control

Control

SARA

Supporting Members



24 GHz Short Range Radar FCC OET visit Nov.13th, 2001

Traffic scenarios

**Accidents and pile-ups
on freeways**



**Head-on collisions
in dense city traffic**

Parking lot collisions

Need for accident prevention

“A death from vehicle crashes every 13 min. (injury every 14 sec.)
41,200 motor vehicle deaths per year.”

(National Safety Council, *Injury Facts*, 1999)

Statement of U.S.A. National Transportation Safety Board Public Meeting - 1 May 2001:
**“Develop and implement a program to inform the public
on the benefits, use, and effectiveness of C.W.S. and A.C.C.”**
(C.W.S. = collision warning system; A.C.C. = adaptive cruise control)

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DELPHI



Causes of Rear-End Crashes

DRIVER INATTENTION

68%



Source: NHTSA

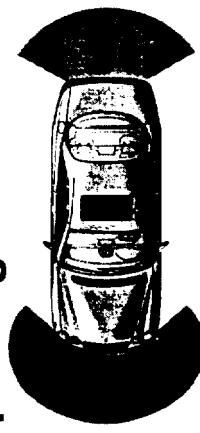
Audi, BMW, DaimlerChrysler, Fiat, Ford, Jaguar, Opel / GM, Porsche, PSA Peugeot Citroën, Renault, Saab, Seat, Volkswagen, Volvo, A.D.C., Bosch, InnoSent, Megamos, Siemens VDO, TRW, Tyco Electronics, Valeo, Visteon.

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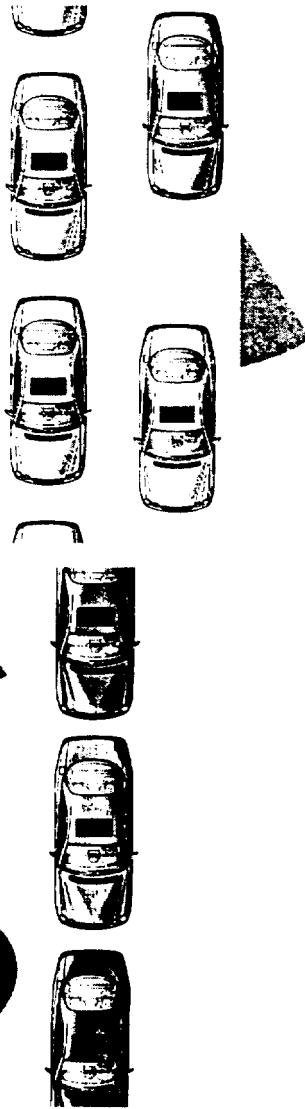
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Fields of application

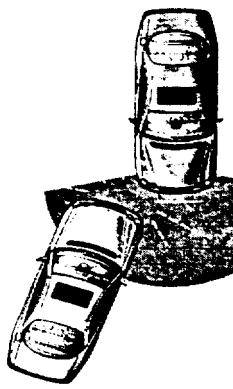
- parking situations



- dense city traffic



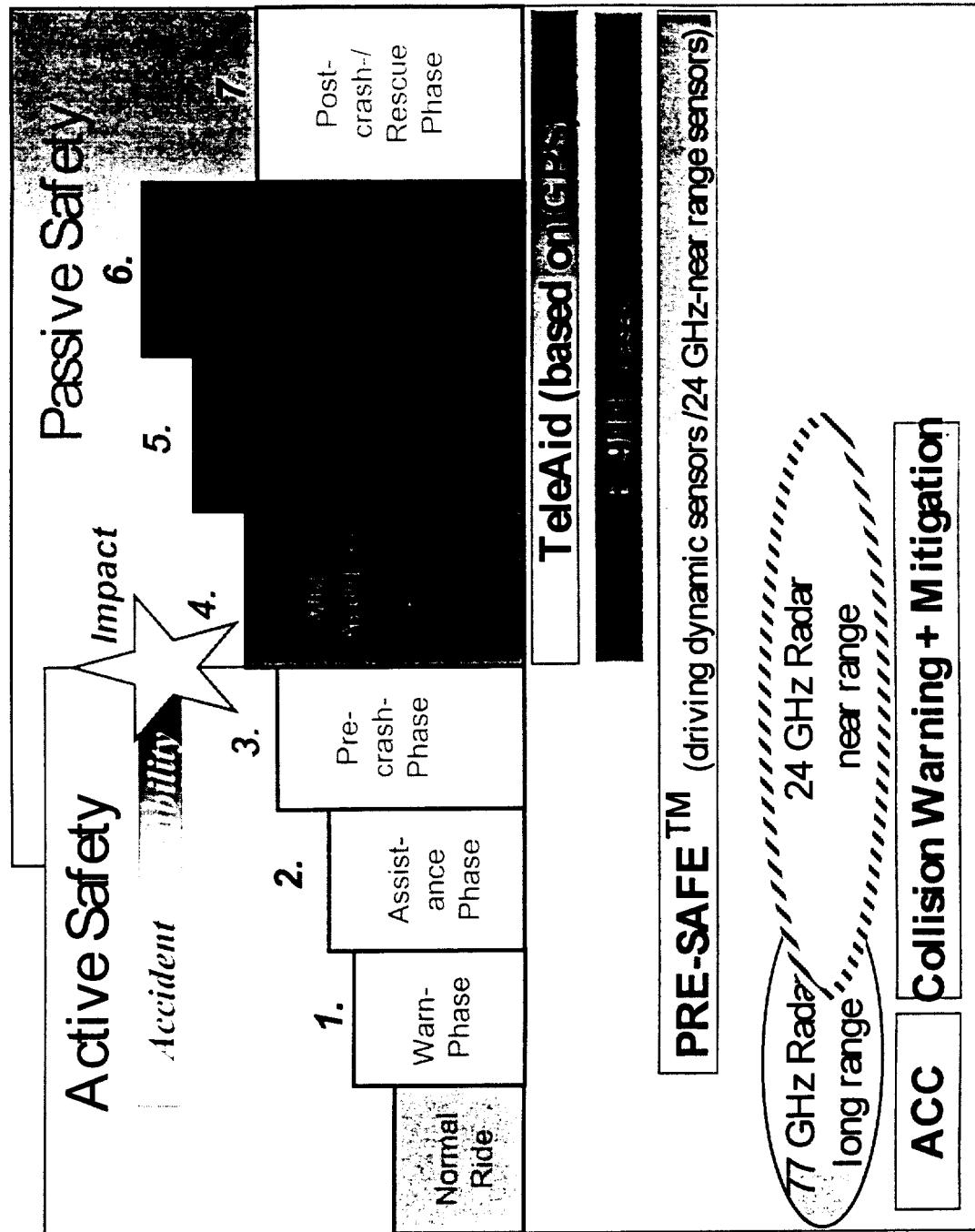
- PreSafe™



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Accident scenarios



Active Safety
enabled by
Radar Sensors

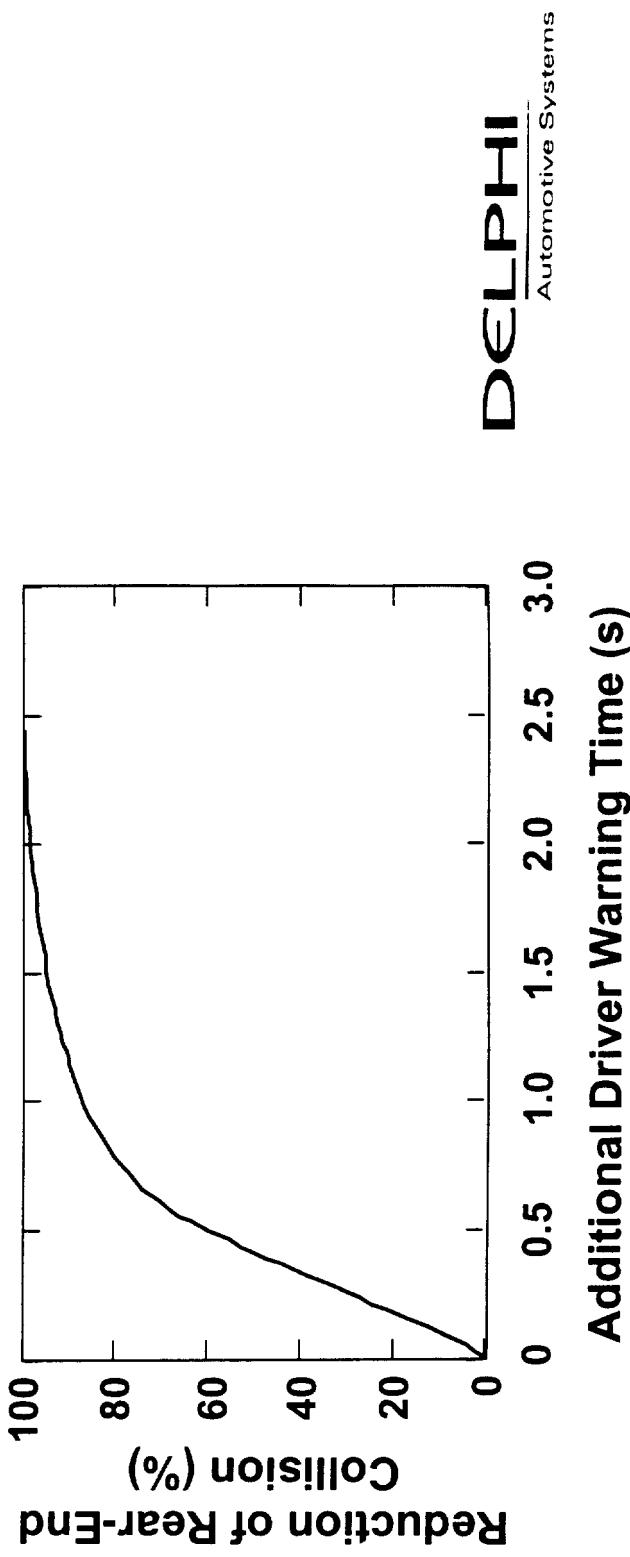
PRE-SAFE™ (driving dynamic sensors /24 GHz-near range sensors)



ACC Collision Warning + Mitigation

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- “Roughly 37 to 74% of rear-end crashes are theoretically preventable by the use of headway detection systems”
 - Source: R. Knippling, et al.; *Assessment of IVHS Countermeasures for Collision Avoidance: Rear End Crashes*, U.S. Dept of Transportation (NHTSA) Technical Report HS807-995, Springfield, VA, 1993.
- “Providing a driver with an additional 1-second of warning time to react can reduce rear-end collisions by nearly 90%”
 - Source: Cited Daimler-Benz investigation, as reported by: Bill Siruru, “Do Collision Warning Systems Reduce Accidents”, UTS, Sept/Oct 1998.



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Potential benefits
... for public
traffic safety

- sensing of the vehicle's surroundings can provide the driver with a “virtual eye”



- semi-autonomous vehicle control
may shorten braking distances
- additional time for preparation
of safety systems (PreSafe™)

- lower probability of crashes caused by cars with sensors
- enhanced mitigation of collision effects
- GPS necessary for E-911, no interference by 24 GHz radar expected
 - This radar system reacts 0.5 seconds faster than a human driver thus allowing 10 meters more braking distance in city traffic

- 60% of rear-end collisions could be avoided
(Source: Daimler-Benz study, 1992)

24 GHz Short Range Radar

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Advantages of 24 GHz

- Integration of moderate antenna sizes into vehicle bumpers because of acceptable attenuation through bumper material
- Permits large BW required for high resolution
- Higher power allowed in 24.0 - 24.25 GHz (Sections 15.245 & 15.249)
- Propagation losses and antenna directivity minimize risk of interference
- Economical MIC design on low cost printed circuit boards
- Affordable
 - Availability of off-the-shelf components from multiple sources
 - High volume chip production
 - Mature automated production processes.
 - Significantly lower sensor cost than 77 GHz (multiple sensors required per system)

Disadvantages of 5.8 GHz and 77 GHz

- **5.8 GHz**
 - Integration of large antenna sizes into vehicle bumpers not feasible
 - 5.0 GHz bandwidth (-20 dB) required for high resolution impractical
- **77 GHz**
 - Unacceptable attenuation through bumper material
 - (Silver paint = 29 dB loss versus 6 dB at 24 GHz)
 - Existing band allocation too narrow to accommodate needed bandwidth
 - Cost Prohibitive
 - Low cost packaged components not available
 - Automated assembly processes not mature
 - Assembly tolerances will always result in tighter process tolerances

24 GHz Short Range Radar FCC OET visit Nov.13th, 2001



SARA's Requested Report & Order Decisions

In order to move forward with the development of their 24 GHz automotive radars, the members of SARA respectfully request the FCC to approve:

- Unlicensed operation of all 24 GHz automotive radars (FCC licensing would be cost prohibitive and is unnecessary).
- Operation of all 24 GHz automotive radars in the restricted bands covered under section 15.205 of the FCC's rules (including 23.6-24.0 GHz).
- Elimination of the pulse desensitization correction factor.
- An average emissions limit in UWB or equivalent mode of 500 microvolts/meter as measured at a distance of 3 meters (-41dBm).

24 GHz Short Range Radar

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Decisions Requested in UWB Report & Order

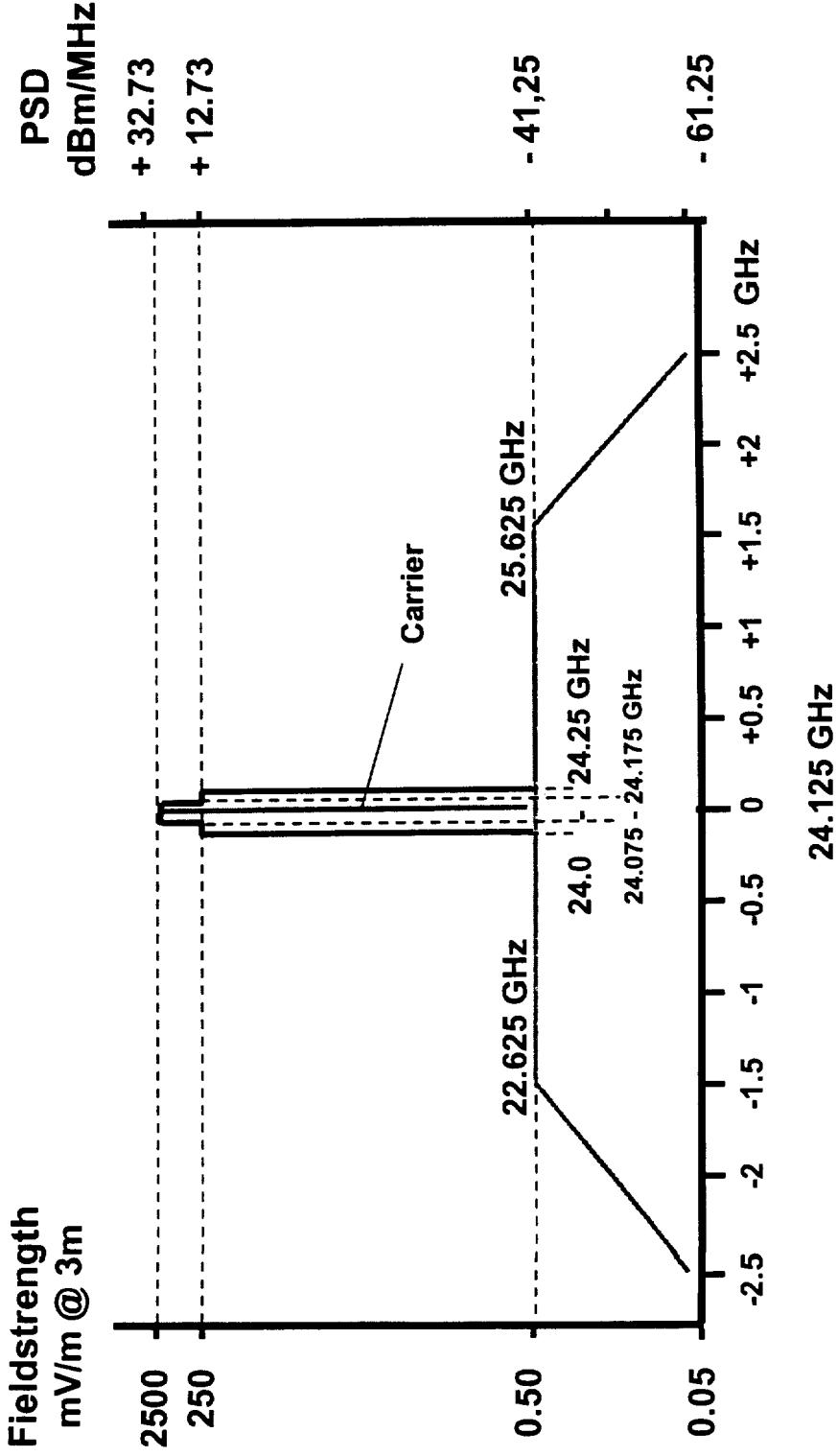
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- Operation of a hybrid device under:
 - A) the emission mask proposed by SARA, or
 - B) as a combination of the FCC's UWB emission limits and sections 15.245 and 15.249 of the FCC's rules.
- The use of alternate modulation systems, including non-pulsed waveforms, at 24 GHz under the same rules.
- An increase from 20dB to 30dB in the Nprm's proposed limit for UWB mode or equivalent peak to average ratio.
- A minimum bandwidth of 500 MHz, instead of 1.5 GHz.
- Release of a FCC Report & Order resolving all these issues by December 2001.

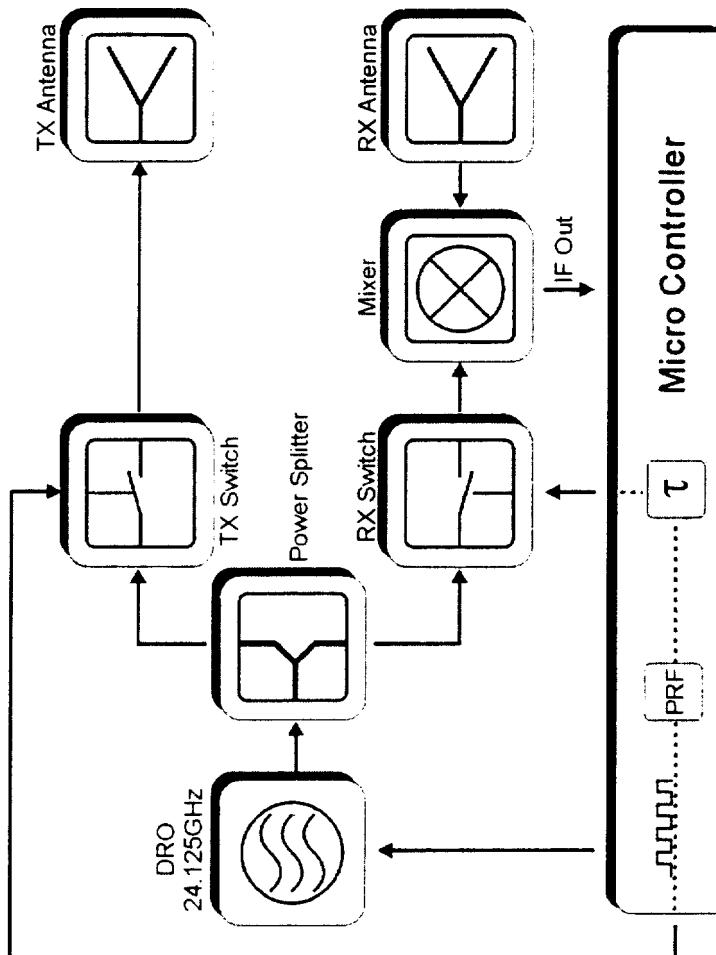
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PROPOSED SARA TRANSMITTER MASK



Pulsed Radar System Block Diagram



- Pulse Doppler Radar with amplitude modulation on 24 GHz carrier
- “Time of flight” measurement based on “equivalent time sampling” principle
- High receiver processing gain (Pulse Correlation & Integration), to allow ultra low power emissions
- Smoothed spectral power distribution due to pseudo-randomized pulse repetition

Pulsed System RF Characteristics

PARAMETER	SYMB	MIN	TYP	MAX	UNIT	NOTE
Carrier Frequency	f_{op}	24.075	24.125	24.175	GHz	
Residual Carrier			Complies with Proposed SARA Mask		dBm	Due to finite switch isolation

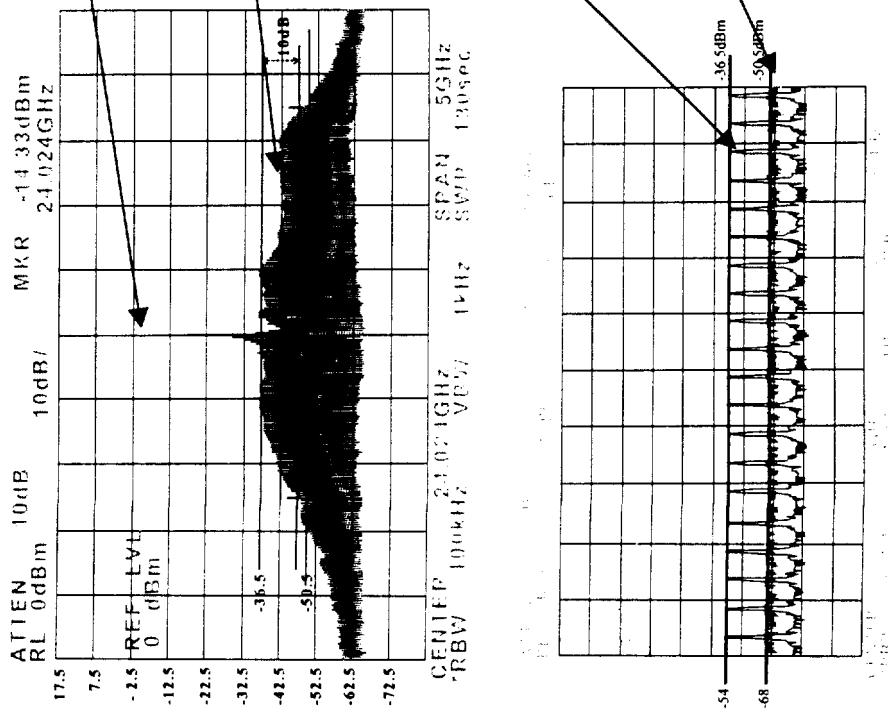
Possible Scenarios	Scenario 1	Scenario 2	Scenario 3	Scenario 4		
Peak power EIRP	P_{PK}	14.5	17.5	17.5	18.5	dBm
Avg. Power EIRP	P_{AVG}	-14.5	-9.95	-8.5	-8	dBm
Power Spectral Density Mean	PSD_{mean}	-107.5	-103.4	-101.5	-101.5	dBm/Hz
Power Spectral Density Peak	PSD_{peak}	-81.5	-81.4	-81.5	-81.5	dBm/Hz @ 50MHz
Pulse Width	t_{pulse}	500	450	500	450	ps
Duty Factor	K_{duty}	29	27.45	26	26.5	dB
Pulse Repetition Frequency	f_{PRF}	2.5	4	5	5	MHz
Peak factor in 50MHz		26	22	20	20	dB
Band Width @ -10dB		2.42	2.68	2.42	2.68	GHz
						Gaussian pulse shape, > 1.5GHz provided

Antenna Characteristics	MIN	TYP	MAX		
Vertical Beamwidth	Φ_{3dB}	12	15	18	deg
Vertical Beamwidth	Φ_{10dB}		26		deg
Vertical Beam Offset	$\Delta\phi$		0		deg
Horizontal Beamwidth	θ_{3dB}	60	70	85	deg
Horizontal Beamwidth	θ_{10dB}		105		deg
Horizontal Beam Offset	$\Delta\theta$		0		deg
Relative Sidelobe Suppression	P_s	18	22	26	dB
Polarization					Linear

Pulse System Performance

PARAMETER	SYMB	MIN	TYP	MAX	UNIT	NOTE
Minimum Range		0.1	0.15	0.2	m	Pulse length dependent
Maximum Range			20		m	Pulse length and target ($1m^2$ RCS) dependent
Precision / Accuracy		2	3.5	5	cm	
Target Separation		15	20	25	cm	
Mounting Height		20	50	150	cm	
Gating	t_{gate}	5	10	15	ms	TX Off time during calculation (max -3dB effect on average emissions)
Sweep Time	t_{sweep}	10	20	30	ms	Range sweep time
Cycle Time	t_{cycle}	15	30	45	ms	

Spectrum of Pulsed Systems



Residual carrier due to limited AM index

Absolute Bandwidth 3GHz @-10dB
fractional BW app.. 12.5%

Comb lines of unsmoothed spectrum

Power density of smoothed spectrum
(appr. -102dBm/Hz)
Emissions drop below thermal noise
($kT = -174\text{dBm/Hz}$) at distance of 4m
for isotropic receivers

Proposed Rules for Ultra-Wideband

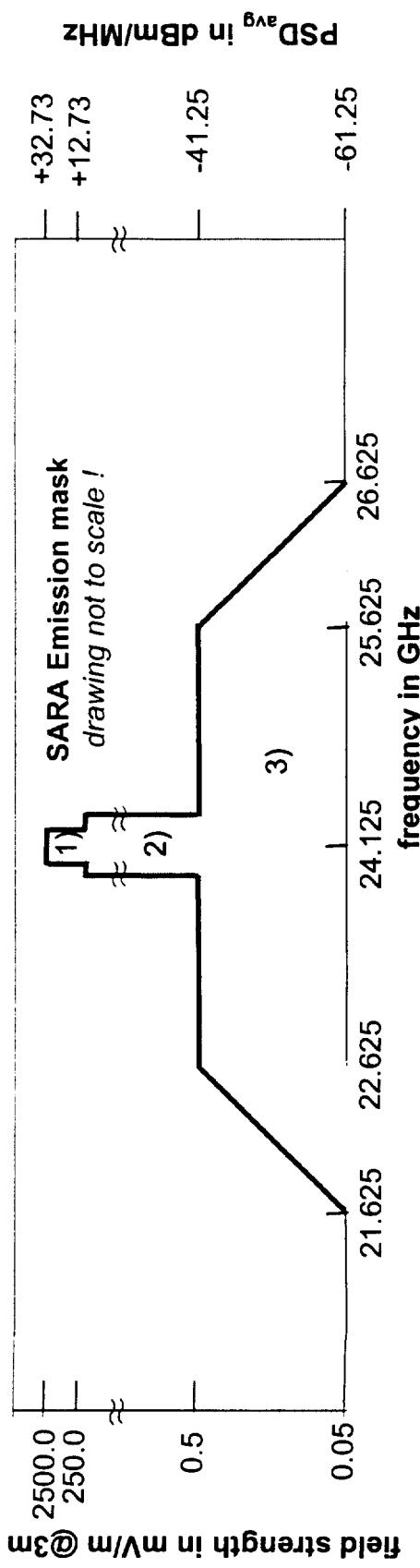
- The SARA Group proposes the inclusion of the following requirements for Pulse Systems:

- Acceptance of proposed SARA transmitter mask
- Increase of peak to average ratio from 20 dB to 30 dB within 50 MHz
 - Relaxation to 30 dB is requested by SARA to achieve full system functionality which is required for safety applications.
- Consider increase of emission levels with higher frequencies because of higher propagation loss (24 GHz vs. 2.4 GHz ==> +20 dB).

To be addressed in ET Docket No. 01-278

Siemens VDO Automotive basic operational modes:

- 1) Only motion detection operating in the Field Disturbance Sensor band pursuant to 47 CFR, § 15.245 within the specified limits
- 2) Low resolution, far range (up to 30m) distance and speed measurement pursuant to 47 CFR, § 15.249 within the specified limits
- 3) High resolution, near range (up to 4m) distance and speed measurement pursuant to 47 CFR, § 15.209 within general emission limits



Audi, BMW, DaimlerChrysler, Fiat, Ford, Jaguar, Opel / GM, Porsche, PSA Peugeot Citroën, Renault, Saab, Seat, Volkswagen, Volvo, A.D.C., Bosch, Delphi, InnoSent, Megamos, Siemens VDO, TRW, Tyco Electronics, Valeo, Visteon.

Methods for achieving high resolution radar:

- Very short pulse width (below 1 ns to achieve more than 1000 MHz BW)
Implementation method:
Pulsed systems operate by rapid switching of a fixed carrier or even without any carrier at all
- Shifting of the carrier frequency over a large frequency range:
Implementation method:
Frequency Hopping (FH) systems that operates by rapidly changing over a large frequency range by the time, which results, on average, in a broadband signal
- Combination of pulsed and frequency hopping system (=pulsed FH):
Implementation method:
Only intermittent frequency changes of the carrier, resulting in a kind of independent time and frequency multiplexing technique